

# **EXHIBIT C**

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2       **UNITED STATES DISTRICT COURT**  
3       **NORTHERN DISTRICT OF CALIFORNIA**  
4       **OAKLAND DIVISION**

5       **MEDIATEK INC.**

6       **Civil Action No. 4:11-cv-05341 (YGR)**

7       Plaintiff,

8       **PLAINTIFF MEDIATEK INC.'S**  
9       **SECOND SET OF**  
10      **INTERROGATORIES TO**  
11      **DEFENDANT FREESCALE**  
12      **SEMICONDUCTOR, INC. (NOS. 22-23)**

13       **FREESCALE SEMICONDUCTOR, INC.**

14       Defendant.

1 Pursuant Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff MediaTek  
2 Inc. ("MediaTek") requests that Defendant Freescale Semiconductor, Inc. ("Freescale") answer  
3 the following interrogatories in writing under oath within thirty days of service.

4 **INSTRUCTIONS**

5 The following instructions apply to the interrogatories below and should be considered  
6 part of each interrogatory.

7 1. Freescale is requested to provide all responsive information. If Freescale  
8 withholds any requested information, Freescale is requested to state the basis for withholding the  
9 information in a manner sufficient to enable MediaTek and the Court to adjudicate the validity of  
10 its withholding. For any information withheld on the grounds of privilege, work product, or  
11 other alleged protection against disclosure, Freescale is instructed to provide at least the  
12 following information:

13 a. A description of the information withheld;  
14 b. The identity of all persons with knowledge of the withheld information;  
15 c. A description of the basis for withholding the information sufficient to  
16 permit the Court to evaluate Freescale's basis for withholding it.

17 2. All interrogatories should be given their broadest reasonable construction, so as to  
18 bring within the scope of the interrogatory information that might otherwise be considered  
19 beyond its scope. In particular:

20 a. The singular form of a word should be interpreted as plural, and the plural  
21 form of a word should be interpreted as singular, whenever appropriate in order to bring  
22 within the scope of any interrogatory information that might otherwise be considered  
23 beyond its scope;

24 b. The connectives "and" and "or" should be construed either disjunctively  
25 or conjunctively, whichever makes the interrogatory most inclusive; and

26 c. The word "any" should be construed to mean each and every.

3. If Freescale objects to any interrogatory on the ground that it is ambiguous in whole or in part, identify in the objection the particular language that Freescale contends is ambiguous and state the interpretation of that language that Freescale has used to respond.

4. If Freescale objects to any portion of any interrogatory for any reason, Freescale is instructed to respond in full to all portions of the interrogatory to which its objection does not apply.

5. None of the definitions and instructions or the interrogatories set forth below should be construed as an admission relating to the existence of any evidence, to the relevance or admissibility of any evidence, or to the truth or accuracy of any statement or characterization in any definition, instruction, or interrogatory.

6. These interrogatories are ongoing and continuing in nature. To the extent that the answers to any of these interrogatories may at any time be supplemented, changed, or otherwise affected by information acquired by Freescale subsequent to service of its answers, MediaTek directs Freescale to promptly serve supplemental answers reflecting such changes in accordance with Federal Rule of Civil Procedure 26(e).

## DEFINITIONS

The following definitions apply to the instructions above and interrogatories set forth below:

1. "Freescale" and "you" means Freescale Semiconductor, Inc. and any of its predecessors, successors, present and former partners, investors, corporate parents, affiliated companies or corporations, direct or indirect subsidiaries, officers, directors, employees, agents, attorneys, servants, representatives, and all other persons acting on their behalf.

2. "MediaTek" means MediaTek Inc. and any of its predecessors, successors, present and former partners, investors, corporate parents, affiliated companies or corporations, direct or indirect subsidiaries, officers, directors, employees, agents, attorneys, servants, representatives, and all other persons acting on their behalf.

1       3.     “Freescale Product” means any product, component, system, circuit device,  
2 integrated circuit, processor, multimedia application processor, microcontroller, or system-on-  
3 chip that has been designed, developed, tested, made, used, demonstrated, imported into the  
4 United States, offered for sale, or sold by Freescale.

5       4.     “Freescale Accused Products” means:

- 6           a.     Freescale’s multimedia processor family i.MX31;
- 7           b.     Freescale’s multimedia processor family i.MX35;
- 8           c.     Freescale’s multimedia processor family i.MX50;
- 9           d.     Freescale’s multimedia processor family i.MX51;
- 10          e.     Freescale’s multimedia processor family i.MX53;
- 11          f.     Freescale’s microcontroller family MCF521X;
- 12          g.     Freescale’s microcontroller family MCF5225X;
- 13          h.     Freescale’s multimedia processor family MPC8358E; and
- 14          i.     Freescale’s multimedia processor family MPC8360E.
- 15          j.     All other Freescale Products that contain any of the features listed below:
  - 16           i.     a Multi-Layer AHB Crossbar Switch (AHBMAX);
  - 17           ii.    an External Memory Controller (EXTMC) or External Memory  
18              Interface (EMI);
  - 19           iii.   a Multi Master Multi Memory Interface (M4IF);
  - 20           iv.    QUICC Engine module;
  - 21           v.     an Arbiter Module capable of operating in Fixed Mode and/or  
22              Round Robin Mode; or
  - 23           vi.    Clock Control Module (CCM) or DVFS load tracking block that  
24              enables dynamic voltage frequency scaling.

25       5.     The terms “document” and “electronically stored information” have the broadest  
meaning permitted under Federal Rule of Civil Procedure 34(a).

26       6.     The terms “identify,” “specify,” and “state” have the following meanings:

1 a. When applicable to documents or electronically stored information, to  
2 provide at least: (i) the name or title of the document or electronically  
3 stored information; (ii) the date on which the document or electronically  
4 stored information was prepared; (iii) the name, title, and company  
5 affiliation of the person who created the document or electronically stored  
6 information; (iv) the name, title, and company affiliation of each person to  
7 whom the document, electronically stored information, or thing was  
8 disclosed; (v) the type or general nature of the document or electronically  
9 stored information (i.e., whether it is a letter, memorandum, minutes of a  
10 meeting, database, spreadsheet, etc.); (vi) the present location of the  
11 document or electronically stored information; and (vii) the name, title,  
12 and company affiliation of each person who maintains custody of the  
13 document or electronically stored information;

14 b. When applicable to a communication, to provide at least: (i) the date,  
15 time, and place of the communication; (ii) the manner of the  
16 communication; (iii) the substance of the communication; (iv) the names  
17 of all parties who participated in, read, heard, saw, or otherwise had access  
18 to the contents of the communication, whether in its original form or in  
19 summary or transcript; and (v) the identity of all documents that  
20 memorialize, commemorate, summarize, record, or refer to the  
21 communication;

22 c. When applicable to a natural person, to provide at least: (i) the person's  
23 full name; (ii) the person's last known residential address and telephone  
24 number; (iii) the name of the person's last known employer; (iv) the  
25 person's last known business address and telephone number; and (v) the  
26 person's last known title or position of employment;

- d. When applicable to an entity, to provide at least: (i) the full name of the entity; (ii) the last known address and telephone number of its principal place of business; (iii) the type of entity (i.e., whether it is a corporation, partnership, association, etc.); and (iv) the state, commonwealth, territory of the United States, or other governmental body in which the entity is registered to do business, together with the dates of such registration; and
- e. When applicable to any other information, to provide sufficient details concerning the characteristics or properties of the requested information so as to enable it to be readily located and distinguished.

## INTERROGATORIES

**INTERROGATORY NO. 22:**

For each wafer from which a Freescale Accused Product has been made, identify:

- a) the location(s) at which any wafer processing (e.g., formation of transistors, deposition, patterning, etching, CMP, photolithography, implantation, grinding, wafer testing, etc.) was done to said wafer;
- b) the entity (or entities) that performed wafer processing on said wafer;
- c) the date on which wafer processing on said wafer was completed;
- d) the location(s) at which any die preparation, packaging and/or testing was performed on said wafer or the die coming from said wafer (e.g., wafer mounting, die cutting, packaging, IC bonding, encapsulation, die testing, etc.);
- e) the entity (or entities) that performed die preparation, packaging and/or testing on said wafer or the die coming from said wafer;
- f) the date on which the Freescale Accused Product from said wafer was approved by Freescale for sale;
- g) the date on which Freescale sold the Freescale Accused Product;

- h) the customer that purchased the Freescale Accused Product from Freescale;
- i) the revenue received by Freescale from the sale of the Freescale Accused Product;
- j) the country in which Freescale sold the Freescale Accused Product and the country to which the Freescale Accused Product was shipped as part of the sale.

**INTERROGATORY NO. 23:**

Separately for each of the Freescale Accused Products, identify all Freescale products and all downstream third-party products that Freescale knows or believes incorporate or utilize the Freescale Accused Product, including but not limited to an identification of the product name, the product model number, the manufacturer of the product, the brand name under which the product is sold, and all documents that evidence such incorporation or utilization.

Dated: January 2, 2012

Respectfully submitted,

MEDIATEK INC.

By their attorneys,

2023 RELEASE UNDER E.O. 14176

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Plaintiff MediaTek Inc.'s Second Set of Interrogatories (Nos. 21-22) was served, pursuant to an agreement between the parties, upon the following individuals by hand delivery and electronic mail on January 2, 2013 to the following addresses:

BY HAND DELIVERY;

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BY ELECTRONIC MAIL:

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I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.  

Dated: January 2, 2013



Patricia Shore